

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10956REK

ERNEST OGLETREE
Plaintiff

v.

CITY OF ATTLEBORO,
STURDY MEMORIAL
HOSPITAL, INC., JAMES G.
MACDONALD, DOUGLAS
JOHNSON, MICHAEL
BARTUCCA, ROBERT ASTIN,
AND LEWIS RHEAUME
Defendants

Handwritten:
3/1/04
J. Rhee

DEFENDANTS STURDY MEMORIAL HOSPITAL, INC.,
DOUGLAS JOHNSON, MICHAEL BARTUCCA,
ROBERT ASTIN AND LEWIS RHEAUME'S
AUTOMATIC DISCLOSURE PURSUANT TO FEDERAL RULES OF CIVIL
PROCEDURE 26A AND LOCAL RULES 26.2A

A. Individuals Likely To Have Discoverable Information

1. All of the parties to the above-referenced matter.
2. All individuals identified by plaintiff in his disclosure.
3. All individuals identified by co-defendants and their respective disclosures.

The defendants Sturdy Memorial Hospital, Douglas Johnson, Michael Bartucca, Robert Astin, and Lewis Rheaume reserve their rights to further supplement this list.

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Of Civil Procedure 26A And Local Rules 26.2A

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B. Documents In The Defendants Sturdy Memorial Hospital, Doug Johnson, Robert Astin, Michael Bartucca and/or Lewis Rheume's Custody Or Control That May Be Used To Support Its Claims or Defenses

1. Medical records of Sturdy Memorial Hospital.
2. Security Officer Reports of Michael Bartucca and Robert Astin
3. These defendants do not possess any other documents relating to this case that they are presently aware of, however, these defendants do incorporate by reference the documents identified in the initial disclosures of the co-defendants.

Additionally, these defendants reserve their rights to further supplement this response as discovery is undertaken.

C. Computation of Damages

N/A

D. Insurance Agreement

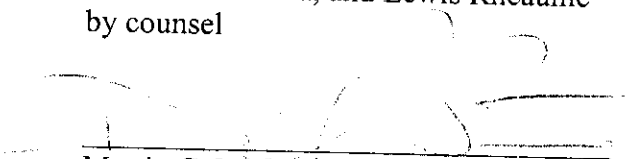
At the time in question, the Sturdy Memorial Hospital was insured by the Medical Professional Mutual Instance Company a/k/a ProMutual under Policy No. 1-29859 with policy limits of \$2 million/\$20 million. At present this policy is providing coverage to the individual security guard defendants as an aggregate. Coverage is being provided under a reservation of rights.

The defendants reserve their rights to supplement these disclosures.

Estate of Bousquet v Athol Memorial Hospital, et al
Defendant Athol Memorial Hospital's Automatic Disclosure Pursuant To Federal Rules
Of Civil Procedure 26A And Local Rules 26.2A

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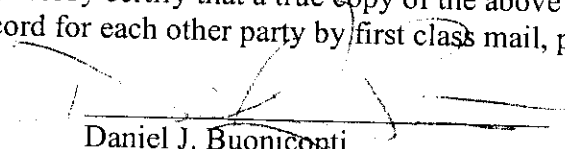
Respectfully submitted
Sturdy Memorial Hospital, Douglas Johnson, Robert Astin,
Michael Bartucca, and Lewis Rheaume
by counsel



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CERTIFICATE OF SERVICE

I, Daniel J. Buoniconti, hereby certify that a true copy of the above document was served upon the attorney of record for each other party by first class mail, postage prepaid on this 5 day of July, 2004.



Daniel J. Buoniconti